

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

FELIX MALDONADO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CERTIFIED AUTOMOTIVE LEASE CORP.
DBA CAL AUTOMOTIVE,

Defendant.

CASE NO. 1:22-cv-01527-KMW-SAK

NOTICE OF SETTLEMENT

Plaintiff Felix Maldonado (“Plaintiff”) and Defendant Certified Automotive Lease Corp. DBA CAL Automotive (“CALAuto” or “Defendant”), jointly notify this Court that they have reached an agreement in principle to settle this matter on an individual basis. To that end, the Parties respectfully request that this Court (1) vacate all pending case deadlines, including response deadlines in respect to Defendant’s pending motion to dismiss (Dkt. 7) and (2) set the following case deadlines:

- i. Plaintiff shall file a Notice of Voluntary Dismissal within thirty (30) days, by June 29, 2022; or
- ii. If Plaintiff is not filing a Notice of Voluntary Dismissal by June 29, 2022, the Parties shall notify the Court with a status update as to the settlement process of this case.

WHEREFORE, the Parties respectfully request that this Court (1) vacate all case deadlines, and (2) set the following case deadlines: (i) Plaintiff shall file a Notice of Voluntary Dismissal within thirty (30) days, by June 29, 2022; or (ii) if Plaintiff is not filing a Notice of Voluntary Dismissal by June 29, 2022, the Parties shall notify the Court with a status update as to the settlement process of this case.

Dated: May 31, 2022

Respectfully Submitted,

/s/ Kevin Laukaitis

Kevin Laukaitis (195202016)

Jonathan Shub (317842020)

SHUB LAW FIRM LLC

134 Kings Hwy E., Fl. 2

Haddonfield, NJ 08033

T: (856) 772-7200

F: (856) 210-9088

klaukaitis@shublawayers.com

jshub@shublawayers.com

Gregory Haroutunian, Esq. (051212013)

M. Anderson Berry

CLAYEO C. ARNOLD,

A PROFESSIONAL LAW CORP.

865 Howe Avenue

Sacramento, CA 95825

Telephone: (916)239-4778

Facsimile: (916)924-1829

gharoutunian@justice4you.com

aberry@justice4you.com

Attorneys for Plaintiff and the Proposed Class

*Pro Hac Vice Applications Filed or
Forthcoming

Respectfully submitted,

/s/ Justin J. Boron

Justin J. Boron (250422019)

Courtney K. Mazzio (131372015)

FREEMAN MATHIS & GARY, LLP

3 Executive Campus Suite 350

Cherry Hill, NJ 08002-4127

jboron@fmglaw.com

cmazzio@fmglaw.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Jonathan Shub, hereby certify that on May 31, 2022, I caused to be electronically filed the above document with the Clerk of the United States District Court for the District of New Jersey using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Kevin Laukaitis

Kevin Laukaitis